U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 SIXTH AVENUE
SEATTLE, WASHINGTON 98101

July 21, 1987

COPY

REPLY TO
ATTN OF: HW-112

CERTIFIED MAIL-RETURN RECEIPT REQUESTED

Richard D. Zweig
General Manager
Chem-Security Systems, Inc.
Star Route
Arlington, Oregon 97812-9707

Dear Mr. Zweig:

This is in follow-up to Chem-Security Systems,'s Inc. (CSSI) July 6, 1987, letter requesting modifications of the May 22, 1987, Temporary PCB Disposal Approval to dispose of polychlorinated biphenyls (PCB) in Cells 1 and 2 of Landfill L-13 at CSSI's Arlington, Oregon, facility. Specifically, CSSI has requested the following:

1. Modification of the groundwater monitoring schedule from monthly sampling to semiannual sampling.

2. Modification of the reporting deadline for submittal of analytical results from monthly reporting to 90-day reporting.

After review of the information provided to support this request, the Environmental Protection Agency (EPA) has decided to modify the PCB Letter of Approval as requested. EPA has also determined it appropriate to make certain clarifying revisions to the May 22, 1987, Temporary PCB Disposal Approval.

The May 22, 1987, Temporary PCB Disposal Approval is hereby amended, effective immediately, as follows (except for Condition 1(d) which is effective retroactively to the original effective date of the May 22, 1987, Temporary PCB Disposal Approval):

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Temporary PCB Disposal Approval

(1) The disposal of PCBs, as defined by 40 CFR §761.2 (incorporated herein by reference), in Landfill L-13 shall be restricted to Cells 1 and 2, as depicted on Drawing No. 1 Project No. 233-07.00. PCB shall be disposed in Landfill L-13 in accordance with 40 CFR §761.60 and the following operational procedures/restrictions:

(a) Special Conditions 1, 5, 8(a), 8(b), 9, 10, 13, 15, 16, 17, 18, 19, 20, 21, 29, 30, 31(a), 31(b), 32, 33, 34, 35, 38, 39(a), and 39(b) under Part C of the currently effective Letter of Approval for disposal of PCBs at CSSI's Arlington facility. ~~(All references in these Special Conditions are based on the codifications contained in Federal PCB Regulations, 40 CFR Part 761.40 (44 Federal Register, 31547 et seq., May 31, 1979))~~ ← Keep in

(b) Pursuant to §761.75(c)(3)(ii), in order to ensure that operations in Cells 1 and 2 of Landfill L-13 do not present an unreasonable risk of injury to health and environment from PCBs, the following requirements, to the extent they are applicable to operations in Cells 1 and 2 of Landfill L-13 must be met (for simplification purposes, the analogous RCRA regulatory language is referenced):

i. Sections 265.13-265.17, 265.31-265.35, 265.37, 265.51-265.56, 265.90-265.94, 265.111-265.120, 265.141-265.150, 265.302, 265.309, 265.310, 265.312, 265.313, 265.314(b), 265.314(c)(1), 265.314(c)(3), 265.314(d), 265.314(f), and 265.315 under Part 265--INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE, AND DISPOSAL FACILITIES. In complying with these sections CSSI shall read "hazardous wastes(s)" as "PCB(s)" whenever it appears.

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(d) In addition to the sampling and analysis required under §265.92(b) of Condition 1(b) above, the Landfill L-13 groundwater monitoring well system will also be sampled and analyzed for PCBs, Chlorides, pH, Specific Conductance, and Total Organic Halogen on a semi-annual basis, with a determination of water elevation levels for each well for each sampling event. The first sampling event for these parameters must take place prior to placement of any PCBs in Landfill L-13. The results of these analysis and water elevation levels should be submitted to EPA Region 10 within 30 days of receipt by CSSI of analytical results from the laboratory, which is not to exceed 90 days of each sampling event. A written record of these sampling and analysis results shall be maintained on-site. Sampling methods and analytical procedures for the parameters PCBs, Chlorides, pH, Specific Conductance, and Total Organic Halogen shall be as specified in 40 CFR Part 136 as amended in 41 CFR 52779 on December 1, 1976, or as specified in Test Methods for Evaluating Solid Wastes, Physical/Chemical Methods, EPA Publication SW-846. In addition, any laboratory performing chemical tests for the operation of Landfill L-13 shall be a participant in EPA's Performance Evaluation Sample Program for analytical quality control.

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(j) A. The operator of the disposal site shall immediately report to the Regional Administrator any detection of PCB in the samples obtained in compliance with the monitoring requirements of Condition 1(d) above, within 48 hours of receiving such information.

B. If CSSI believes, or has reason to believe, that improper disposal or an environmental release, spill, or other uncontrolled discharge of a reportable quantity of PCB, as designated under 40 CFR Part 302, has or might have occurred at the facility or during transport, the operator of the disposal site shall inform the EPA Region 10 office within two business days. A written report of the incident shall be submitted to EPA Region 10 within 10 business days of the incident or of its initial discovery.

(k) Liquids removed from the leachate collection system and/or leak detection system must not be stored, treated or otherwise accumulated in Landfill L-13 for greater than one business day or during non-business days. If these liquids contain PCBs at a concentration of 50 ppm or greater, these liquids must be managed as a PCB in accordance with 40 CFR Part 761 (e.g., cannot be treated, stored or disposed in surface impoundments on-site).

(l) The leak detection systems in Landfill L-13 Cells 1 and 2 must be checked for the presence of liquid at least once every business day. Liquid found in the Cell's leak detection systems must be pumped within 24 hours of its detection. The leak detection system containing the liquid must be pumped dry, to the extent practical. In addition, a chronological record should be maintained on-site of the results of the checks on each Cell's leak detection system and of any pumping activity, including quantity of liquid pumped. If the volume of liquid found in either Cell's leak detection system exceeds "20 gallons per acre per day plus measurement error" for two consecutive monitoring days (gallonage measured which includes accumulation from non-business days will be assumed to have accumulated in equal portions to the first business day measured, e.g. the Zone was pumped dry on Friday and the first check is performed the end of business on Monday indicating 50 gallons, the 50 gallons should be divided by three and the number of applicable acres to determine the amount of gallons for each of these days), CSSI must do the following:

A. Before the close of the next business day notify EPA Region 10 PCB Coordinator by telephone at (206) 442-4153 and provide EPA within 10 business days copies of all data collected, as directed above in this condition and in Condition 1(m) below, and copies of any written evaluations performed with this data.

B. CSSI must immediately implement one of the following alternatives (i, ii, or iii):

i. (a) Implement measures to locate and repair the leak and obtain a certification from an independent qualified licensed engineer that the repaired portion of the liner meets Landfill L-13 design specifications and construction quality assurance and control plan.

(b) Submit a report to EPA, Region 10, documenting the measures taken to locate and repair the leak and the certification referred to in (a) above.

(c) If EPA determines that the remedial and corrective activities are not satisfactory, EPA will notify CSSI of this determination in writing. CSSI will be required to remove all PCBs and RCRA hazardous waste from the impacted portions of Landfill L-13 or complete final closure of the impacted portions of Landfill L-13.

ii. Provide EPA notification of CSSI's intent to close the impacted portions of Landfill L-13 in conformance with the timeframes and standards specified under Sections 265.111-120 of Condition 1(b) above.

iii. Comply with a written plan of action submitted to EPA by CSSI, which EPA determines to be satisfactory.

(m) The leachate collection system for Landfill L-13's Cells 1 and 2 shall be checked for the presence of liquid at least once every business day. If any liquid is found in the leachate collection system, the system should be pumped to sustain the height of leachate at no greater than one foot.

A chronological record should be maintained on-site of the results of the checks on the leachate collection system and of any pumping activity, including leachate level prior to pumping, quantity of leachate pumped, and level of leachate after pumping.

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(o) A. Disposal in Cells 1 and 2 of Landfill L-13 of RCRA wastes, RCRA/PCB waste mixtures and PCB wastes must be conducted so that it does not:

i. Generate extreme heat or pressure, fire or explosion, or violent reaction;

ii. Produce uncontrolled toxic mists, fumes, dust, gases in sufficient quantities to threaten human health;

iii. Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosions;

iv. Damage the structural integrity of the device or facility containing the waste, or

v. Through other like means threaten human health or the environment.

B. Disposal of RCRA wastes, RCRA/PCB waste mixtures and PCB wastes meeting the characteristic of ignitability as defined under §261.21 and which are in the form of a non-liquid as demonstrated by the absence of free liquids using Method 9095 (See Condition 1(c) for complete reference of method) are not precluded for land disposal by §761.75(b)(8)(iii) and are authorized for disposal in Cells 1 and 2 of Landfill L-13 when managed in accordance with the practices designated in §265.312 under Condition 1(b) above.

(p) Approval of PCB disposal in Landfill L-13 Cells 1 and 2 shall continue until a final determination is issued by EPA (and effective) in response to CSSI's request for reissuance of this approval. The Regional Administrator may act at any time to extend, alter, amend, modify, suspend, or revoke this approval as he deems necessary or appropriate. Approval of PCB disposal in Landfill L-13 will be withdrawn if EPA determines that CSSI is not continuing to make all possible efforts in resolving remaining dual RCRA Part B and PCB application deficiencies (i.e., groundwater monitoring network design, landfill remedial action plan, waste analysis plan, etc.).

If EPA ultimately makes a determination not to reissue this approval, and/or EPA determines that CSSI is not continuing to make all possible efforts in resolving remaining dual RCRA Part B and PCB application deficiencies, CSSI must immediately cease placement of PCB wastes in Landfill L-13 and must then either complete final closure on the portion of Landfill L-13 utilized for PCB disposal or must then remove all PCBs from Landfill L-13. If CSSI elects the closure option, it must place a 10 foot wide soil dike separating the portion of Landfill L-13 utilized for PCBs from the unused portion of the trench. The 10 foot wide dike would have to be certified to be structurally sound, and to have a permeability of no greater then 1×10^{-7} cm/sec. Supporting documentation for the certification must, at a minimum, include an as-built drawing, construction procedures, stability analysis, compaction data and permeability data.

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All correspondence or inquiries on this matter should be directed to Catherine Massimino of the Hazardous Waste Division, at (206) 442-4153.

Sincerely,

Gary L. O'Neal

for Robie G. Russell
Regional Administrator

cc: Senator Mark Hatfield
T. Virnig, CSSI
J. Whitworth, Department of Environmental Quality